

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA) INDICTMENT NO.
)
 v.) 18 U.S.C. § 922(g)(1)
) Possession of a Firearm by a
 TODD JOSEPH HARBUCK) Prohibited Person
)
) 18 U.S.C. § 922(j)
) Possession of a Stolen Firearm

THE GRAND JURY CHARGES THAT:

CR 123 - 0019

COUNT ONE

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about July 19, 2022, in Columbia County, within the Southern District
of Georgia, the defendant,

TODD JOSEPH HARBUCK,

knowing he had been previously convicted of a crime punishable by imprisonment for
a term exceeding one year, did knowingly possess, in and affecting commerce, a
firearm, to wit: a Glock 23, .40 caliber handgun, and a Smith and Wesson, .32 caliber
revolver, which had been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

FILED
U.S. DISTRICT COURT

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COUNT TWO

Possession of a Stolen Firearm

18 U.S.C. § 922(g)(1)

On or about July 19, 2022, in Columbia County, within the Southern District of Georgia, the defendant,

TODD JOSEPH HARBUCK,

knowingly possessed a stolen firearm, to wit: a Glock 23, .40 caliber handgun, which had been transported in interstate and foreign commerce, knowing and having reasonable cause to believe the firearm was stolen.

All in violation of Title 18, United States Code, Section 922(j).

PRIOR OFFENSES

Prior to committing the offense(s) charged in the Indictment, the defendant,

TODD JOSEPH HARBUCK,

was previously convicted of at least three or more crimes of violence and/or serious drug offenses, qualifying offenses as defined by Title 18, United States Code, Section 924(e), on occasions different from one another, to wit:

1) Obstruction of a Law Enforcement Officer (00-RCCR-1219), Richmond County Georgia, Offense date: July 12, 2000, Conviction date: December 28, 2000;

2) Aggravated Assault (00-RCCR-157), Richmond County Georgia, Offense date: December 30, 1999, Conviction date: September 9, 2000;

3) Assault with Intent to Kill (General Sessions Court 08GS-35-345 through 08GS-35-353), McCormick County South Carolina, Offense date: July 20, 2008, Conviction date: November 6, 2008.

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction, the defendant, **TODD JOSEPH HARBUCK**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense, including, but not limited to, a Smith and Wesson, .32 caliber revolver bearing serial number 740030.

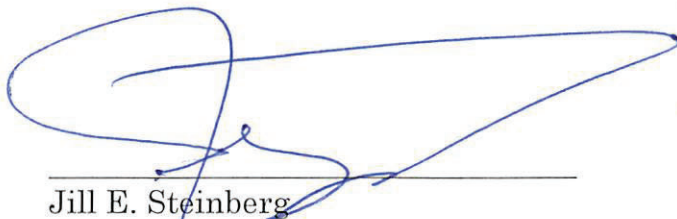
If any of the property described above, as a result of any act or commission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

(Signatures follow on next page)

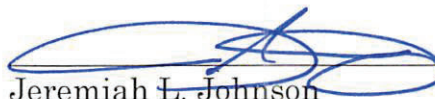
A True Bill.

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Jill E. Steinberg
United States Attorney

A handwritten signature in blue ink that reads "Patricia G. Rhodes" in a cursive style.

Patricia G. Rhodes
Assistant United States Attorney
Chief, Criminal Division

A handwritten signature in blue ink that reads "Jeremiah L. Johnson" in a cursive style.

Jeremiah L. Johnson
Assistant United States Attorney
Lead Counsel